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Before the

**THE SECRETARY OF EDUCATION'S COMMISSION ON
THE FUTURE OF HIGHER EDUCATION**

April 6, 2006

BACKGROUND: THE COUNCIL FOR HIGHER EDUCATION ACCREDITATION

The Council for Higher Education Accreditation (CHEA) is a private, national membership organization of approximately 3,000 degree-granting colleges and universities. Founded in 1996 through a referendum of college and university presidents, CHEA coordinates institutional and programmatic accreditation in the United States. CHEA represents the interests of its members on matters of accreditation as this relates to federal and public policy. It scrutinizes accrediting organizations for quality (a process called "recognition") based on the standards that CHEA has developed for this purpose.* And, through its conferences, meetings, research and publications, CHEA provides an institutional voice for self regulation of higher education.

At present, 60 institutional and programmatic accrediting organizations are recognized by CHEA. CHEA has also contributed significantly to the national and international dialogue on key accreditation issues such as accountability, student learning outcomes, information to the public, distance learning, degree mills and accreditation mills and the accreditation-federal government relationship. CHEA frames these issues and offers tools and suggestions to institutions, accrediting organizations, students and the public.

CHEA is governed by a 20-person elected board of directors, the majority of whom must be current chief executive officers of degree-granting colleges and universities. The organization is funded primarily by annual fees paid by its member institutions.

ACCREDITATION OPERATION

The Futures Commission's third *Issue Paper* provides a comprehensive overview of accreditation in the United States (Schray, 2006). For purposes of this testimony, it is important to emphasize that accreditation is carried out by 81 recognized private, nonprofit organizations. These organizations accredit approximately 7,000 institutions and more than 18,000 programs. Accrediting organizations report expenditures of \$70 million in 2004-2005. Accreditation is funded primarily by fees charged to institutions and programs that are accredited. In 2004-2005, accrediting organizations employed approximately 650 paid full- and part-time staff. These employees were assisted by more than 16,000 volunteers from the higher education community, business and the public who served on accreditation decision-making bodies as well as on accreditation teams that visited institutions and programs as part of the accreditation review process (CHEA 2006).

*CHEA recognition is similar in some ways to the recognition process of the federal government carried out through the U.S. Department of Education (USDE) and its National Advisory Committee on Institutional Quality and Integrity. Some accrediting organizations are recognized by CHEA, some by USDE, some by both CHEA and USDE.

ACCREDITATION'S VALUE TO SOCIETY

Accreditation is a longstanding, pervasive and well-entrenched feature of U.S. society and provides significant value to students, to government and to the private sector. Accreditation:

- ◆ *Assures quality.* Accreditation is the primary means by which colleges, universities and programs assure quality to students and the public. Accredited status is a signal to students and the public that an institution or program meets at least threshold standards for, e.g., its faculty, curriculum, student services and libraries. Accredited status is conveyed only if institutions and programs provide evidence of fiscal stability.
- ◆ *Provides access to federal and state funds.* Accreditation is required for access to federal funds such as student aid and other federal programs. Federal student aid funds are available to students only if the institution or program they are attending is accredited by a recognized accrediting organization. State funds to institutions and students are also contingent on accredited status.
- ◆ *Engenders private sector confidence.* Accreditation status of an institution or program is important to employers when evaluating credentials of job applicants and when deciding whether to provide tuition support for current employees seeking additional education. Private individuals and foundations look for evidence of accreditation when making decisions about private giving.
- ◆ *Eases transfer.* Accreditation is important to students for smooth transfer of courses and programs among colleges and universities. Receiving institutions take note of whether or not the credits a student wishes to transfer have been earned at an accredited institution. Although accreditation is but one among several factors taken into account by receiving institutions, it is viewed carefully and is considered an important indicator of quality.

ACCREDITATION AND THE KEY VALUES AND BELIEFS OF HIGHER EDUCATION

Accreditation is grounded in certain values and beliefs about higher education: the importance of institutional mission, the centrality of institutional autonomy and the vital role of academic freedom. These values and beliefs have been part of creating an enterprise of higher education that is unparalleled in its commitment to access, its diversity and its quality:

- ◆ Higher education institutions have primary responsibility for academic quality; colleges and universities are the leaders and the key sources of authority in academic matters.
- ◆ Institutional mission is central to judgments of academic quality.
- ◆ Institutional autonomy is essential to sustaining and enhancing academic quality.
- ◆ Academic freedom flourishes in an environment of academic leadership of institutions.
- ◆ The higher education enterprise and our society thrive on decentralization and diversity of institutional purpose and mission.

THE COMMISSION AND EXPECTATIONS FOR ACCOUNTABILITY

The national dialogue about accountability initiated by the commission has, to date, reflected a strong preference that higher education quality be judged first and foremost by evidence of institutional performance and student achievement. There have been urgent calls for more useful, relevant and easily accessible information to students and the public about higher education performance. There has also been considerable conversation about uniform quality standards at the national level, perhaps achieved through standardized testing, to judge and compare higher

education institutions. Finally, some involved in the commission dialogue are seeking an enhanced rigor in higher education and accreditation, especially in the area of general education outcomes.

Accreditation has been a significant feature in the national dialogue about these accountability expectations, especially whether accreditation can serve as a lever for change, a pressure point to move higher education to more fully address accountability. The dialogue includes attention to the U.S. Department of Education's oversight of accrediting organizations through the federal recognition process – the one place where the government directly impacts accreditation policy and practice and can affect the operation of accreditation on an ongoing basis.

Some of this dialogue surrounding accreditation has, at times, tended toward the negative, with commentary that accreditation is an inadequate force to address these expectations and needs to be somehow “fixed” - improved or seriously reformed. Some engaged in the dialogue maintain that if higher education routinely points to accreditation as its front line of quality and accountability, it is reasonable to expect that accreditation would play a central role in addressing current public policy concerns about accountability.

A NATIONAL ACCREDITATION FOUNDATION

One of the major *Issues Papers* of the commission (Dickeson, 2006) offers an approach to achieve the accountability expectations described above, a “National Accreditation Foundation.” After reviewing accreditation as it is currently structured and operating, the paper concludes that accreditation is inadequate to address accountability. Several reasons are offered: Accreditation is a self regulatory process and self regulation is ineffective to assure quality; accreditation is focused on institutional purposes and not public purposes; accreditation is not sufficiently public; and, in general, “Accreditation of higher education in the United States is a crazy-quilt of activities, processes and structures that is fragmented, arcane, more historical than logical and has outlived its usefulness” (p.1).

A National Accreditation Foundation, in contrast, would meet accountability expectations because it would nationalize quality standards for all postsecondary education as well as nationalize processes for all accreditation and insist on greater transparency. It would be governed by individuals from business, government and from public higher education. The Foundation, established by federal legislation, would succeed the current federal oversight of accreditation.

The National Accreditation Foundation approach consists primarily of a restructuring of accreditation that would eliminate its diversity and its regionalism (in the case of the regional accrediting commissions) as well as dilute the role of institutions in determining academic quality, thereby diminishing the alleged negative effect of self regulation. The restructuring would establish a ministry-type structure for higher education and academic quality.

This restructuring would also, however, undermine the success of higher education and accreditation in the United States by attacking the unique combination of responsibility and freedom that has historically defined our colleges and universities. This freedom and responsibility have meant that colleges and universities determine their academic purposes (a mission-based approach to higher education), maintain the essential independence and space to carry out academic work (institutional autonomy) and creatively engage the opportunity for open intellectual inquiry (academic freedom).

Accreditation both mirrors and reinforces the key elements of freedom and responsibility. All accrediting organizations have standards that call for commitment to mission, institutional autonomy and academic freedom as a condition of obtaining and maintaining accredited status. At their mutual very best, accreditation and higher education enjoy a vital partnership around these key elements of higher education success.

Nationalizing academic standards and accreditation would have the deleterious impact of driving down diversity of institutional mission in higher education, reducing the scope of action of institutions in academic areas and subordinating the work of faculty to a single set of national standards. The Foundation would be at variance with the recent survey of *The Economist* that both criticizes U.S. higher education and, at the same time, calls it “the best” – precisely because we do not have a ministry of education or “central plan” for higher education and the federal government plays a limited role (September 10, 2005).

ACCREDITATION AND AN ACCOUNTABILITY AGENDA

There is another approach to the accountability issues raised by the commission’s dialogue that does not require a restructuring of accreditation, yet can make progress toward accountability expectations – while not exacting the price associated with nationalizing academic standards and accreditation. The “Accountability Agenda” offered here seeks to realize some of the ends identified by the commission, but offers a different means from the National Accreditation Foundation or any other effort based on nationalizing quality standards and accreditation process.

The Accountability Agenda is based on several key assumptions: that higher education and accreditation are partners in any solution to address accountability; that higher education and accreditation must make additional investment in accountability; that a voluntary, nongovernmental approach that builds on the success of higher education and accreditation is preferable to a top-down government-based approach; and that the key factors related to the success of higher education to date – a mission-based system that requires responsible institutional independence and academic freedom – are to remain intact.

The agenda is made up of four recommendations for action, calling on accrediting organizations and institutions to:

1. Expand and refine evidence of institutional performance and student achievement, assuring that this vital evidence is used as the key factor in determination of the quality of higher education;
2. Create more transparency - useful, relevant and easily accessible information - particularly to assist students and the public, as they make judgments about higher education quality.
3. Move voluntarily toward more consistency and comparability among institutions about performance and student achievement.
4. Work toward enhanced rigor in higher education through more demanding expectations of general education at colleges and universities and toward enhanced rigor of accreditation through more robust expectations of general education to raise threshold standards of institutional quality.

The realization of the Accountability Agenda would rely on a range of incentives and would be fueled by the current climate of opinion that reflects a growing sense of urgency about strengthening higher education and accreditation accountability.

Money is one incentive to move the Accountability Agenda, finding funds from the public or private sector that can be used to support progress here. Higher education associations are another incentive, playing a leadership role with their members to achieve greater accountability. A third incentive is the market and competition: If some colleges, universities and accrediting organizations that are fully responsive to calls for accountability gain in stature, size and reputation, others are likely to follow. A fourth incentive is the likelihood that, absent action by higher education and accreditation, federal or state government would seek additional legislation to dictate certain accountability behaviors.

These incentives are embedded in a climate of opinion increasingly defined by a sense of urgency that higher education and accreditation take additional action with regard to accountability. Factors contributing to this sense of urgency include the growing consumer-minded attitude on the part of the public that demands more consumer-focused information about higher education, accompanied by concern to assure that paying the current price of higher education yields tangible benefits. Technology plays a role here as well, with various uses of the Internet rapidly resulting in Websites and data sets with extensive information about higher education that can be arrayed in various ways to judge academic quality. This moves the quality discussion away from higher education and accreditation to other venues. The Futures Commission itself is a reflection of this sense of urgency and might decide to pursue a monitoring role following the issue of its August 2006 report, using the example of another federal body – the 9/11 Commission.

THE ACCOUNTABILITY AGENDA: FOUR RECOMMENDATIONS

Accreditation and Evidence of Institutional Performance and Student Achievement

Recommendation 1

Accrediting organizations need to incorporate expectations into their standards that institutions create and sustain additional tools for more robust and reliable evidence of institutional performance and student achievement, without dictating the specific tools. Institutions need to decide what tools are desirable and how they will be used.

Background

The most significant change in accreditation practice in the past ten years has been the expansion of accountability through enriched expectations about evidence of institutional performance and student achievement. All institutional accrediting organizations have standards and policies that call for evidence of institutional performance and student achievement (CHEA, Internal Review, March 2006). Eighty-five percent of programmatic accrediting organizations have outcomes based standards (CHEA, 2002).

Colleges and universities have long provided students, the public and elected officials with easy access to a plethora of information about their performance and student achievement. For example, almost all colleges and universities have created basic “Fact Books” and other valuable documents that extensively describe performance and achievement and are regularly available to any interested party. More recently, institutions have creatively captured the potential of the Internet, making volumes of information about courses, programs, services, degrees and performance easily accessible.

Some tools are already available to examine institutional performance and student achievement. Other tools can be developed. The Collegiate Learning Assessment (CLA) Project is often mentioned in this context, accompanied by the Education Testing Service (ETS) Measure of Academic Proficiency and Progress (MAPP) and the five state indicators developed by the National Center for Public Policy and Higher Education.

Accreditation and Transparency

Recommendation 2

Accrediting organizations need to incorporate expectations that colleges and universities develop additional templates or formats that concentrate even more explicitly on the type of information about performance and achievement that students and the public need. Institutions need to decide what these templates might be and how they might be used, couching this information in

an institutional context (e.g., mission, profiles of the student population being served). Where appropriate, these templates might be shared across institutions.

Accrediting organizations also need to expand the information they provide the public about their key decisions. This means going beyond the categorical “accredited” or “not accredited” indications of institutional status to a more expansive description of what it means to have earned accreditation.

Background

Accrediting organizations already provide considerable information to the public about the status of the institutions and programs they accredit. A number of organizations have descriptive summaries of the institutions or programs they accredit and publish their accreditation standards and policies. Information is readily available about the operation of the accrediting organization, its staff, finances and decision-making bodies (CHEA 2006a). Accrediting organizations can be influenced to take a next step in providing the public with greater understanding of the meaning of decisions about accredited status.

As a brief scrutiny of the Websites of higher education institutions will quickly reveal, these colleges and universities invest a great deal in their presence before the public. Building on these already prolific efforts, institutions can be influenced to focus more directly on more information that is clearly targeted to the needs of students and the public.

Accreditation, Consistency and Comparability

Recommendation 3

Accrediting organizations and institutions need to explore and engage the growing interest in comparisons of quality across institutions as well as national and international rankings of the performance of institutions. Pilot efforts are needed to examine forms of comparability and rankings that might be acceptable to colleges and universities and to explore whether, ultimately, colleges and universities as well as accrediting organizations will need to move in this direction to remain nationally and internationally competitive.

The regional accrediting commissions are particularly challenged to strengthen consistency and comparability, with some participants in the current dialogue calling for a “nationalization” of the regional structure. Given this challenge, these commissions would benefit from exploring whether they should further expand their capacity to operate nationally - but in select instances, e.g., when dealing with large, multi-unit institutions that are distance-based or site-based with locations that cross a number of regions.

Background

Some higher education associations already encourage their members who use the same tools for performance and achievement (e.g., the CLA) to compare their results over time. Other groups of institutions are similarly engaged. With regard to rankings, 22 countries now have ranking systems and instruments in this field are increasingly reliable and sophisticated. This is a powerful incentive for U.S. institutions to address this issue.

In addition, the capacity of those outside higher education and accreditation (e.g., *U.S. News and World Report*) to provide comparisons and rankings is expanding and constitutes a serious challenge. Data about higher education are increasingly available electronically and, more and more, are susceptible to analysis and interpretation from a range of constituents. The Education Trust and the Institute for College Access and Success, Inc. are but two private sector examples. The Integrated Postsecondary Education System (IPEDS) *Data Feedback Report* and the *Reports of Institutional Effectiveness* in Virginia are public sector examples. It is in higher

education's and accreditation's best interests to reflect on whether these approaches to quality will become sufficiently entrenched such that the academy will need to develop its own tools in these areas.

Accreditation, General Education and Rigor

Recommendation 4

Accrediting organizations need to expand their already considerable emphasis on general education outcomes, increasing the rigor of their general education expectations as a means to raise threshold accreditation standards for the expected results of undergraduate education or the baccalaureate. Higher education institutions need to similarly invest in more rigorous general education as a central means to strengthen undergraduate education for all students.

Background

Virtually all institutional accrediting organizations have standards for general education. These standards need to be additionally reviewed to both increase the rigor of general education expectations and to elevate threshold expectations to achieve or retain accredited status.

Additional attention to general education is also a means to increase the academic rigor of colleges and universities, including attention to data that appear to confirm that higher education needs to do a better job with student achievement, e.g., the results of the National Assessment of Adult Literacy (NAAL) or the Organisation of Economic Cooperation and Development (OECD) research. The Association of American Colleges and Universities (AAC&U) key liberal education outcomes provide one valuable basis for this work. The CLA and MAPP, already acknowledged as useful tools for student learning outcomes, add value when defining expected general education outcomes.

SUMMARY

Whatever the ultimate impact of the Futures Commission, it will not do for higher education and accreditation to ignore the difficult issues of accountability within the commission's sights. Calls for robust evidence of performance and achievement, transparency, consistency and comparability and increased rigor through general education are likely to persist well beyond the life of this federal body.

The Accountability Agenda offered here consists of four recommendations to strengthen accreditation's role. Working with institutions: accrediting organizations need to

- ◆ Develop and use additional tools to create strengthened evidence of institutional performance and student achievement;
- ◆ Provide additional transparency: expanded and more useful information to the public about both institutional performance and student achievement as well as accreditation decisions;
- ◆ Engage the growing interest in consistency and comparability about higher education quality; and
- ◆ Increase the rigor of higher education and accreditation through additional attention to general education.

This agenda is based on the assumption that it is desirable to retain the key features of higher education and accreditation that have led to their success to date. These are the strong leadership role played by institutions related to matters of academic quality, the ongoing commitment to institutional mission, institutional autonomy and academic freedom and the effective partnership relationship between higher education and accreditation.

References

Council for Higher Education Accreditation. *CHEA 2005 Almanac of External Quality Review*, Washington DC, 2006.

Council for Higher Education Accreditation. *CHEA Survey of Recognized Accrediting Organizations: Providing Information to the Public*, Washington DC, 2006a.

Dickeson, Robert C. *The Need for Accreditation Reform*, The Secretary of Education's Commission on the Future of Higher Education, Washington, DC, 2006.

Eaton, Judith S. *Specialized Accreditation and Assuring Quality in Distance Learning*, CHEA Monograph Series 2002, Number 2, Washington DC: Council for Higher Education Accreditation, 2002.

Schray, Vickie. *Assuring Quality in Higher Education: Key Issues and Questions for Changing Accreditation in the United States*. The Secretary of Education's Commission on the Future of Higher Education, Washington, DC, 2006.